IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE	*	BKRTCY. NO. 11-10699 MCF
EDWIN CARRASQUILLO DIAZ LORENZA ELFRIDA CORA SANTIAGO	*	CHAPTER 13
	*	
DEBTORS		

DEBTORS' MOTION AND NOTICE OF FILING OF POST-CONFIRMATION MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329

TO THE HONORABLE COURT:

COME NOW, EDWIN CARRASQUILLO DIAZ, R.I.P., and LORENZA ELFRIDA CORA SANTIAGO, the debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. The debtors are hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated June 30, 2016, herewith and attached to this motion.

2. This Plan modification is filed to **provide for a "lump sum payment" in the sum of $16,524.00 at month sixty (60) of the Plan, for a new total Plan base of $28,324.00. All other Plan provisions stay the same.**

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtor and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 30th day of June, 2016.

/s/Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR PETITIONERS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico, San Juan Division

IN RE:

CARRASQUILLO DIAZ, EDWIN & CORA SANTIAGO, LORENZA ELFRIDA
Debtor(s)

Case No. 11-10699-13
Chapter 13

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 6/30/2016 ☐ PRE ☑ POST-CONFIRMATION

☐ AMENDED PLAN DATED: ______ Filed by: ☐ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

$ 200.00	x	59	= $	11,800.00
$ 16,524.00	x	1	= $	16,524.00
$	x		= $	
$	x		= $	
$	x		= $	

TOTAL: $ 28,324.00

Additional Payments:
$________ to be paid as a LUMP SUM within ________ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in addition to the above:
$________ x ______ = $ ________

PROPOSED BASE: $ 28,324.00

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: $ 2,931.00

Signed: *[signature]* Lorenza E Cora Santiago
Debtor

____
Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR ____ $ ________

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☑ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☑ Trustee pays secured ARREARS:

Cr. BPPR	Cr. Oriental Bank	Cr.
# 8930050036481	# 13249617580654	#
$ 1,049.94	$ 1,128.12	$

2. ☐ Trustee pays IN FULL Secured Claims:

Cr.	Cr.	Cr.
#	#	#
$	$	$

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr.	Cr.	Cr.
#	#	#
$	$	$

4. ☑ Debtor SURRENDERS COLLATERAL to Lien Holder:
ASOCIACION EMPLE COOP A/C MAUNAB

5. ☐ Other:

6. ☑ Debtor otherwise maintains regular payments directly to:
BPPR Oriental Bank

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☑ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: ________
☐ Paid 100% / ☐ Other: ________

Cr.	Cr.	Cr.
#	#	#
$	$	$

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: *(Executory contracts; payment of interest to unsecureds, etc.)*
*** "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."**
Late filed claims filed by creditors will receive no distribution.
"Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank.
Debtor reserves the right to object claims after plan confirmation.

Attorney for Debtor RFigueroa Carrasquillo Law Office PSC Phone: (787) 744-7699

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Label Matrix for local noticing
0104-3
Case 11-10699-MCF13
District of Puerto Rico
Old San Juan
Thu Jun 30 14:31:32 AST 2016

BANCO BILBAO VIZCAYA ARGENTARIA PR
PO BOX 364745
SAN JUAN, PR 00936-4745

Banco Popular De Puerto Rico Mortgage Divisi
P.O. Box 363507
San Juan, PR 00936-3507

DORAL BANK
PO BOX 70308
SAN JUAN, PR 00936-8308

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

MAUNA COOP
PO BOX 127
MAUNABO, PR 00707-0127

MIDLAND FUNDING LLC BY AMERICAN INFOSOURCE L
ATTN DEPARTMENT 1
PO BOX 4457
HOUSTON, TX 77210-4457

MIDLAND FUNDING LLC/RECOSER LLC
25 SE 2ND AVE STE 1120
MIAMI, FL 33131-1605

(p)ORIENTAL BANK AND TRUST
PO BOX 195115
SAN JUAN PR 00919-5115

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

ASOCIACION EMPLEADOS DE GOBIERNO DE PR
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BANCO POPULAR DE PR
PO BOX 364445
SAN JUAN, PR 00936-4445

BANCO POPULAR DE PUERTO RICO
BANKRUPTCY DEPARTMENT
PO BOX 366818
SAN JUAN PR 00936-6818

Banco Popular de Puerto Rico-Mortgage
Mortgage Servicing Department (762)
P.O. Box 362708, San Juan PR 00936

CLARO
PO BOX 70366
SAN JUAN, PR 00936-8366

COOP A/C MAUNABO
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MAUNABO, PR 00707-0127

DEPARTMENT OF EDUCATION
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GREENVILLE, TX 75403-4169

DORAL BANK
C/O REBECA CAQUIAS, ESQ.
PO BOX 363507
SAN JUAN, PR 00936-3507

DORAL FINANCIAL
1451 FD ROOSEVELT AVE
SAN JUAN, PR 00920-2717

DPTO DE TRANSPORTACION Y OBRAS PUBLICAS
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SAN JUAN, PR 00940-1269

GE Capital Retail Bank
c/o Recovery Management Systems Corp
25 SE 2nd Ave Suite 1120
Miami FL 33131-1605

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JC PENNEY
PO BOX 364788
SAN JUAN, PR 00936-4788

MAUNA-COOP
JUAN A SANTOS BERRIOS ESQ
PO BOX 9102
HUMACAO PUERTO RICO 00792-9102

Midland Funding LLC
by American InfoSource LP as agent
PO Box 4457
Houston, TX 77210-4457

Portfolio Investments II LLC
c/o Recovery Management Systems Corporat
25 SE 2nd Avenue Suite 1120
Miami, FL 33131-1605

Recovery Management Systems Corporation
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

SALLIE MAE
PO BOX 9500
WILKES BARRE, PA 18773-9500

SALLIE MAE INC. ON BEHALF OF USA FUNDS
ATTN: BANKRUPTCY LITIGATION UNIT E3149
P.O. BOX 9430
WILKES-BARRE, PA 18773-9430

SANTANDER FINANCIAL D/B/A ISLAND FINANCE
PO BOX 195369
SAN JUAN PR 00919-5369

Sallie Mae Inc, on behalf of the
Department of Education
DOE
P.O. Box 740351
Atlanta, GA 30374-0351

WALMART
PO BOX 530927
ATLANTA, GA 30353-0927

ALEJANDRO OLIVERAS RIVERA
ALEJANDRO OLIVERAS CHAPTER 13 TRUS
PO BOX 9024062
SAN JUAN, PR 00902-4062

EDWIN CARRASQUILLO DIAZ
HC 65 BOX 4365
PATILLAS, PR 00723-9320

LORENZA ELFRIDA CORA SANTIAGO
HC 65 BOX 4365
PATILLAS, PR 00723-9320

MONSITA LECAROZ ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
ST CLOUD, MN 56302-9617

ORIENTAL BANK
ENRIQUE NASSAR RIZEK & ASSOCIATES
PO BOX 191017
SAN JUAN, PR 00919

(d)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
ST CLOUD MN 56302

End of Label Matrix	
Mailable recipients	38
Bypassed recipients	0
Total	38